| SOUTHERN DISTRICT OF NEW YORK | X |
|-------------------------------|---------------------|
| COLORTREE GROUP, LLC, | Civil Action No. |
| Plaintiff, | COMPLAINT |
| -against- | JURY TRIAL DEMANDED |
| AUTOTROL CORPORATION, | |
| Defendant. | X |

LINITED STATES DISTRICT COLIRT

The plaintiff, Colortree Group, LLC ("Plaintiff" or "Colortree"), by its attorneys, Hogan & Cassell, LLP, hereby alleges against the defendant, Autotrol Corporation ("Defendant" or "Autotrol"), as follows:

PARTIES

- 1. At all times hereinafter mentioned Plaintiff is and was a limited liability company organized under the laws of the State of New York. At all times hereinafter mentioned until October 31, 2020, the actual place of business of Colortree was at 231 West 39th Street, New York, NY 10018 and at all times thereafter was at 230 West 39th Street, New York, NY 10018. Wei Zhao (known in American business circles as Alex Zhao) was and is the sole member and owner of Plaintiff and resides at Room 603, Building 1, Runjing International, No. 9 Tianxing Road, Jiangning District, Nanjing, China and is a Chinese citizen.
- 2. At all times hereinafter mentioned, Defendant was and is a corporation organized under the laws of the State of Delaware and qualified to do business in the State of Illinois with its principal place of business located at 365 East Prairie Street, Crystal Lake, Illinois 60039.

JURISDICTION AND VENUE

3. Plaintiff brings its Complaint under federal diversity jurisdiction, 28 U.S.C. §

1332(a)(2). Plaintiff is deemed to be a citizen of China since its sole owner is a Chinese citizen and Defendant is deemed to be a citizen of both Delaware and Illinois because of its place of incorporation and principal place of business respectively. Therefore, Plaintiff on the one hand and Defendant on the other hand are completely diverse in citizenship and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b), because a substantial part of the events or omissions giving rise to this action occurred in this District.

FACTS

- 5. Between May and July 2020, the parties entered into six transactions whereby Autotrol agreed to pay Colortree for plastic bottles with either a foam or a lotion pump head (collectively the "Goods").
 - 6. All of the Goods were manufactured in China and shipped to the United States.
- 7. The transactions are memorialized in six separate invoices and an invoice summary (attached hereto as Exhibit 1).
- 8. Specifically, the first transaction, invoice CT001, was invoiced from Colortree in New York City to Autotrol. The invoice details the number of goods in the shipment and the cost per item. The invoice totaled \$310,000. Autotrol has paid this invoice in full. See Exhibit 1.
- 9. On or about July 4, 2020, Colortree issued invoice CT002. This invoice reflects shipments of 1.7 oz. clear bottles with foam pump head. The invoice details the number of goods in the shipment and the cost per item. The invoice totaled \$186,000. Autotrol has only paid \$93,000 of this invoice, leaving a balance due of \$93,000. See Exhibit 1.

- 10. On or about July 12, 2020, Colortree issued invoice CT003. This invoice reflects shipments of 1.7 oz. clear bottles with foam pump head. The invoice details the number of goods in the shipment and the cost per item. The invoice totaled \$177,000. Autotrol has only paid \$88,500 of this invoice, leaving a balance due of \$88,500. See Exhibit 1.
- 11. On or about July 19, 2020, Colortree issued invoice CT004. This invoice reflects shipments of 1.7 oz. clear bottles with foam pump head. The invoice details the number of goods in the shipment and the cost per item. The total of the invoice is \$166,096.80. Autotrol has only paid \$75,000 of this invoice, leaving a balance due of \$91,096.80. See Exhibit 1.
- 12. On or about July 4, 2020, Colortree issued invoice CT005. This invoice reflects shipments of 16 oz. clear bottles with lotion pump head. The invoice details the number of goods in the shipment and the cost per item. The total of the invoice is \$209,250. Autotrol has paid \$200,338.74 of this invoice, leaving a balance due of \$8,911.26. See Exhibit 1.
- 13. On or about June 1, 2020, Colortree issued invoice CT006. This invoice reflects shipments of 1.7 oz. clear bottles with lotion pump head. The invoice details the number of goods in the shipment and the cost per item. The total of the invoice is \$330,000. Autotrol has not paid any of this invoice, leaving a balance due of \$330,000. See Exhibit 1.
- 14. As reflected in the first page of Exhibit 1, the six invoices total \$1,378,346.80 and the payments on account total \$766,838.74, leaving the balance of \$611,508.06.
- 15. As reflected in the last page of Exhibit 1, Autotrol made a \$10,000 payment towards the balance on December 2, 2020, leaving a balance due of \$601,508.06.
 - 16. Defendant has accepted the Goods without objection.

AS AND FOR A FIRST CAUSE OF ACTION BREACH OF CONTRACT

- 17. Plaintiff repeats, reiterates and realleges, each allegation set forth in paragraphs 1 through 16 inclusive hereof as if fully set forth herein.
- 18. Plaintiff has performed all conditions, covenants and promises required to be performed by Plaintiff in connection with the Goods.
 - 19. The Goods were sold, delivered and received by Defendant without objection.
- 20. The total value of the Goods provided to Defendant is \$1,378,346.80, of which Defendant has paid \$776,838.74, leaving the balance of \$601,508.06.
- 21. Defendant's failure to pay in full for the Goods is in breach of the parties' agreement.
- 22. As a direct result of Defendant's breach of contract, Plaintiff is entitled to \$601,508.06, plus interest, costs and fees.

AS AND FOR A SECOND CAUSE OF ACTION ACCOUNT STATED

- 23. Plaintiff repeats, reiterates and realleges, each allegation set forth in paragraphs 1 through 22 inclusive hereof as if fully set forth herein.
- 24. Plaintiff asserts this cause of action in the alternative should the Court find that there is not a binding contract between the parties.
- 25. Between May and July 2020, the parties entered into six transactions whereby Autotrol agreed to pay Colortree for plastic bottles with either a foam or a lotion pump head.
- 26. The transactions are memorialized in six separate invoices and an invoice summary (attached hereto as Exhibit 1).
 - 27. Each invoice details the number of goods in the shipment and the cost per item.

- 28. Defendant received the Goods and the invoices and did not object to same.
- 29. Defendant only made partial payment as to the invoices, leaving a present balance due of \$601,508.06.
- 30. As a direct result of Defendant's failure to pay the invoices, Plaintiff is entitled to \$601,508.06, plus interest, costs and fees.

AS AND FOR A THIRD CAUSE OF ACTION GOODS SOLD AND DELIVERED

- 31. Plaintiff repeats, reiterates and realleges, each allegation set forth in paragraphs 1 through 30 inclusive hereof as if fully set forth herein.
- 32. Plaintiff asserts this cause of action in the alternative should the Court find that there is not a binding contract between the parties and not a valid claim for an account stated.
- 33. Between May and July 2020, the parties entered into six transactions whereby Autotrol agreed to pay Colortree for plastic bottles with either a foam or a lotion pump head.
- 34. The transactions are memorialized in six separate invoices and an invoice summary (attached hereto as Exhibit 1).
 - 35. Each invoice details the number of goods in the shipment and the cost per item.
 - 36. The Goods were sold, delivered and received by Defendant without objection.
- 37. Defendant only made partial payment for the Goods, leaving a present balance due of \$601,508.06.
- 38. As a direct result of Defendant's failure to pay for the Goods in full, Plaintiff is entitled to \$601,508.06, plus interest, costs and fees.

JURY TRIAL DEMAND

Plaintiff hereby demands a jury trial of all issues.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- (1) Awarding damages in an amount of \$601,508.06, plus interest;
- (2) Awarding the costs and disbursements of this action, including reasonable attorneys' fees; and
- (3) Awarding Plaintiff such other and further relief as the Court deems just and proper.

Dated: June 24, 2022

Respectfully submitted,

HOGAN & CASSELL, LLP Attorneys for Plaintiff, Colortree Group, LLC

Michael Cassell

500 North Broadway, Suite 153

Jericho, New York 11753

Tel. (516) 942-4700 Fax (516) 942-4705

Email: mcassell@hogancassell.com

EXHIBIT 3

| | | | | - |
|----------------------------|----------------------|--------------------------|-----------------|--------------|
| | | ec Group, LLC E SUMMA | | |
| INVOICE TO: | Autotrol Corp | | DATE ISSUED | 08-27-2020 |
| ADDRESS: | 365 East Prairie Str | eet | | |
| | Crystal Lake, IL 600 | 14 | | |
| CONTACT: | Robert Frantz | | | |
| | Cell: 510-828-6651 | | | |
| | rob@usabottling.com | <u>m</u> | | |
| | | | | |
| | | | | |
| DESCRIPTION | TOTAL PIECES | TOTAL AMOUNT | RECEIVED AMOUNT | BALANCE DUE |
| Order 1 (1.7oz Foam Pump) | 500,000 | \$310,000.00 | \$310,000.00 | \$0.00 |
| Order 2 (1.7oz Foam Pump) | 300,000 | \$186,000.00 | \$93,000.00 | \$93,000.00 |
| Order 3 (1.7oz Foam Pump) | 300,000 | \$177,000.00 | \$88,500.00 | \$88,500.00 |
| Order 4 (1.7oz Foam Pump) | 281,520 | \$166,096.80 | \$75,000.00 | \$91,096.80 |
| Order 5 (16oz Lotion Pump) | 225,000 | \$209,250.00 | \$200,338.74 | \$8,911.26 |
| Order 6 (1.1M Lotion Pump) | 1,100,000 | \$330,000.00 | | \$330,000.00 |
| TOTAL DUE | | | | \$611,508.06 |
| PLFAS | SE REMIT PAY | MENTS IMM | EDIATELY TO: | |
| / | | EE GROUP, | | |
| | | 9th Street, Suite 8 | | |
| | *** | ork, NY 10018 | 10 | |
| | | 12)730-1616 | | |



| | INVOI | CE | | |
|---|---|---|--|--|
| INVOICE TO: | AUTOTROL CORP | 0.000 | | |
| ADDRESS: | 365 East Prairie Street | INVOICE #: | CT001 | |
| | Crystal Lake, IL USA 60039 | DATE ISSUED: | 06/28/2020 | |
| CONTACT: | Robert Frantz | BY: | COLORTREE GROUP, LL | .C |
| | Cell: 510-828-6651 | ADDRESS: | 231 West 39th Street, Suit | e 818 |
| | rob@usabottling.com | | New York, NY 10018 | |
| | | PHONE: | (212)730-1616 | |
| SHIPPING ADDRE | SS: (If difference from above address) | CONTACT: | Frances Goldfarb | |
| | | | frances@colortreeus.com | |
| | | | | |
| Unit Cost: | \$0.62/pc | | **** | |
| Total Quantity: | 500000pcs | | | |
| Purchase Terms: | | | | |
| | | | | |
| ITEM: | 1.7oz Clear Bottle with Foam Pump Head | | | |
| | | | | |
| DELIVERY: | Air + Sea | | | |
| DELIVERY: | Air + Sea Datails | Total Pieces | Price/PC | Cost |
| Summary | | Total Pieces 39,750 | Price/PC \$0.62 | Vivo de Salada por la Especia de la Constantina del Constantina de la Constantina del Constantina de la Constantina de l |
| Summary 06/07/2020 Air | Détails | ###################################### | | \$24,645.0 |
| Summary 06/07/2020 Air 06/08/2020 Air | Details 1.7oz Clear Bottle with Foam Pump Head | 39,750 | \$0.62 | \$24,645.0 \$22,785.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 | \$0.62 \$0.62 | \$24,645.0 \$22,785.0 \$39,060.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 | \$0.62 \$0.62 \$0.62 | \$24,645.00 \$22,785.00 \$39,060.00 \$33,480.00 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air | 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 | \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.00 \$22,785.00 \$39,060.00 \$33,480.00 \$37,200.00 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air | 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.00 \$22,785.00 \$39,060.00 \$33,480.00 \$37,200.00 \$28,830.00 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air | 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 60,000 46,500 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.0 \$22,785.0 \$39,060.0 \$33,480.0 \$37,200.0 \$28,830.0 \$124,000.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air 06/13/2020 Air | 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 60,000 46,500 200,000 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.0 \$22,785.0 \$39,060.0 \$33,480.0 \$37,200.0 \$28,830.0 \$124,000.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air 06/13/2020 Air | 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 60,000 46,500 200,000 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.0 \$22,785.0 \$39,060.0 \$33,480.0 \$37,200.0 \$28,830.0 \$124,000.0 \$310,000.0 (\$85,000.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air 06/13/2020 Air | 1.7oz Clear Bottle with Foam Pump Head Total: Paid: | 39,750 36,750 63,000 54,000 60,000 46,500 200,000 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.0 \$22,785.0 \$39,060.0 \$33,480.0 \$37,200.0 \$28,830.0 \$124,000.0 \$310,000.0 (\$85,000.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air | Details 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 60,000 46,500 200,000 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.0 \$22,785.0 \$39,060.0 \$33,480.0 \$37,200.0 \$28,830.0 \$124,000.0 (\$85,000.0 (\$50,000.0 (\$25,000.0 |
| Summary 06/07/2020 Air 06/08/2020 Air 06/10/2020 Air 06/11/2020 Air 06/12/2020 Air | 1.7oz Clear Bottle with Foam Pump Head | 39,750 36,750 63,000 54,000 60,000 46,500 200,000 | \$0.62 \$0.62 \$0.62 \$0.62 \$0.62 | \$24,645.00 \$22,785.00 \$39,060.00 \$33,480.00 \$37,200.00 \$28,830.00 \$124,000.00 (\$85,000.00 (\$50,000.00 (\$75,000.00 (\$75,000.00 |

| For and on behalf of Buyer | For and on behalf of Seller |
|----------------------------|---------------------------------|
| AUTOTROL CORP | COLORTREE GROUP, LLC |
| 365 East Prairie Street | 231 West 39th Street, Suite 818 |
| Crystal Lake, IL USA 60039 | New York, NY 10018 |
| | |
| | |
| Authorized Signature: | Authorized Signature: |
| Date: | Date: |



| | INVO | ICE | | | |
|-----------------|--|--------------|-----------|----------------------|--------------|
| INVOICE TO: | AUTOTROL CORP | ; · | | | |
| ADDRESS: | 365 East Prairie Street | INVOICE #: | CT002 | | |
| | Crystal Lake, IL USA 60039 | DATE ISSUED: | 07/04/20 | 20 | |
| CONTACT: | Robert Frantz | BY: | COLORT | TREE GROUP, LL | С |
| | Cell: 510-828-6651 | ADDRESS: | 231 Wes | t 39th Street, Suite | 818 |
| | rob@usabottling.com | | New Yor | k, NY 10018 | |
| | 32 | PHONE: | (212)730 |)-1616 | |
| SHIPPING ADDRE | SS: (If difference from above address) | CONTACT: | Frances | Goldfarb | |
| | | | frances@ | colortreeus.com | |
| Unit Cost: | \$0.62/pc | | | | |
| Total Quantity: | 300000pcs | | | | |
| Purchase Terms: | | | | | |
| ITEM: | 1.7oz Clear Bottle with Foam Pump Head | | | | -0. |
| DELIVERY: | Sea | | | | |
| Summary | Details | Total Pieces | | Price/PC | Cost |
| ETA: 06/28 Boat | 1.7oz Clear Bottle with Foam Pump Head | 43,000 | | \$0.62 | \$26,660.00 |
| ETA: 07/04 Boat | 1.7oz Clear Bottle with Foam Pump Head | 257,000 | | \$0.62 | \$159,340.00 |
| | Total: | 300,000 | | | \$186,000.00 |
| | Paid: | | | - | (\$93,000.00 |
| | Balance Due: | | | | \$93,000.00 |
| | | | | | |
| F | | | For and o | n behalf of Seller | |
| | or and on behalf of Buyer | | | | |
| | or and on behalf of Buyer AUTOTROL CORP | * | COLORT | REE GROUP, LLC | |
| | | | | 9th Street, Suite 8 | |
| | AUTOTROL CORP | | 31 West 3 | | |



| | INVO | ICE | | | |
|------------------------------------|--|--------------|----------------------|---|--|
| INVOICE TO: | AUTOTROL CORP | | | | |
| ADDRESS: | 365 East Prairie Street | INVOICE #: | CT003 | | |
| | Crystal Lake, IL USA 60039 | DATE ISSUED: | 07/12/20: | 20 | |
| CONTACT: | Robert Frantz | BY: | COLORT | REE GROUP, LLC | 0 |
| | Cell: 510-828-6651 | ADDRESS: | 231 Wes | t 39th Street, Suite | 818 |
| | rob@usabottling.com | | New York | k, NY 10018 | |
| | | PHONE: | (212)730 | -1616 | |
| SHIPPING ADDRES | SS: (If difference from above address) | CONTACT: | Frances | Goldfarb | |
| | | | frances@ | colortreeus.com | |
| Unit Cost: | \$0.59/pc | | | | |
| Total Quantity: | 300000pcs | 4.1.2.1.1. | | | |
| | | | | | |
| Purchase Terms: | | | | | |
| ITEM: | 1.7oz Clear Bottle with Foam Pump Head | | | | |
| DELIVERY: | Sea | | | | |
| Summary | Details | Total Pieces | | Price/PC | |
| | Ctano | | | FIICEIFC | Cost |
| ETA: 07/04 Boat | 1.7oz Clear Bottle with Foam Pump Head | 100,000 | | \$0.59 | |
| ETA: 07/04 Boat ETA: 07/12 Boat | STATE OF THE PROPERTY OF THE P | 100,000 | | | \$59,000.00 |
| | 1.7oz Clear Bottle with Foam Pump Head | 200,000 | | \$0.59 | \$59,000.00 \$118,000.00 |
| | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head | 200,000 | | \$0.59 | \$59,000.00 \$118,000.00 \$177,000.00 |
| | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total: | 200,000 | | \$0.59 | \$59,000.00 \$118,000.00 \$177,000.00 (\$88,500.00 |
| | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total: Paid: | 200,000 | | \$0.59 | \$59,000.00 \$118,000.00 \$177,000.00 (\$88,500.00 |
| ETA: 07/12 Boat | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total: Paid: | 200,000 | For and o | \$0.59 | \$59,000.00 \$118,000.00 \$177,000.00 (\$88,500.00 \$88,500.00 |
| ETA: 07/12 Boat | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total: Paid: Balance Due: | 200,000 | | \$0.59 \$0.59 | \$59,000.00 \$118,000.00 \$177,000.00 (\$88,500.00 \$88,500.00 |
| ETA: 07/12 Boat | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total: Paid: Balance Due: | 300,000 | COLORTI | \$0.59 \$0.59 | \$59,000.00 \$118,000.00 \$177,000.00 (\$88,500.00 \$88,500.00 |
| ETA: 07/12 Boat | 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total: Paid: Balance Due: or and on behalf of Buyer AUTOTROL CORP | 300,000 | COLORTI 31 West 3 | \$0.59 \$0.59 on behalf of Seller REE GROUP, LLC | \$59,000.00 \$118,000.00 \$177,000.00 (\$88,500.00 \$88,500.00 |



| | INVOI | CE | | | |
|---|---|---|--------------------|--|--|
| NVOICE TO: | AUTOTROL CORP | | | | |
| ADDRESS: | 365 East Prairie Street | INVOICE #: | CT004 | | |
| | Crystal Lake, IL USA 60039 | DATE ISSUED: | 07/19/2020 | 0 | |
| CONTACT: | Robert Frantz | BY: | COLORTE | REE GROUP, LLC | ; |
| | Cell: 510-828-6651 | ADDRESS: | 231 West | 39th Street, Suite | 818 |
| | rob@usabottling.com | | New York, | NY 10018 | |
| | | PHONE: | (212)730- | 1616 | |
| SHIPPING ADDRE | SS: (If difference from above address) | CONTACT: | Frances G | Soldfarb | |
| | | | frances@d | colortreeus.com | |
| | | | | | |
| Unit Cost: | \$0.59/pc | | | | |
| Total Quantity: | Order Quantity: 300000pcs, Shipped Quant | ity: 281520pcs | | | |
| Purchase Terms: | | | | | |
| Turchase remis. | | | | | |
| ITEM: | 1.7oz Clear Bottle with Foam Pump Head | | | | |
| | | | | | |
| DELIVERY: | Sea | | | | |
| DELIVERY: | Sea Details | Total Pieces | | Price/PC | Cost |
| | | Total Pieces | | Price/PC \$0.59 | |
| Summary | Details | DESCRIPTION OF DESCRIPTION OF PERSONS AND PROPERTY. | + | | \$29,795.0 |
| Summary ETA: 07/12 Boat | Details 1.7oz Clear Bottle with Foam Pump Head | 50,500 | + | \$0.59 | \$29,795.0 |
| Summary ETA: 07/12 Boat | Details 1.7oz Clear Bottle with Foam Pump Head | 50,500 | | \$0.59 | \$29,795.0 \$136,301.8 |
| Summary ETA: 07/12 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head | 50,500 231,020 281,520 | | \$0.59 | \$29,795.00 \$136,301.80 \$166,096.80 |
| Summary ETA: 07/12 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total | 50,500 231,020 281,520 | | \$0.59 | \$29,795.00 \$136,301.80 \$166,096.80 (\$75,000.00 \$91,096.80 |
| Summary ETA: 07/12 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total Paid | 50,500 231,020 281,520 | | \$0.59 | \$29,795.00 \$136,301.80 \$166,096.80 (\$75,000.00 |
| Summary ETA: 07/12 Boat ETA: 07/19 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total Paid Balance Due | 50,500 231,020 281,520 | | \$0.59 | \$29,795.0 \$136,301.8 \$166,096.8 (\$75,000.0 \$91,096.8 |
| Summary ETA: 07/12 Boat ETA: 07/19 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total Paid Balance Due | 50,500 231,020 281,520 | For and o | \$0.59 \$0.59 | \$29,795.0 \$136,301.8 \$166,096.8 (\$75,000.0 \$91,096.8 |
| Summary ETA: 07/12 Boat ETA: 07/19 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total Paid Balance Due | 50,500 231,020 281,520 | For and or COLORTE | \$0.59 \$0.59 | \$29,795.00 \$136,301.80 \$166,096.80 (\$75,000.00 \$91,096.80 |
| Summary ETA: 07/12 Boat ETA: 07/19 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total Paid Balance Due For and on behalf of Buyer AUTOTROL CORP | 50,500 231,020 281,520 | For and of COLORTF | \$0.59 \$0.59 n behalf of Seller | \$29,795.0 \$136,301.8 \$166,096.8 (\$75,000.0 \$91,096.8 |
| Summary ETA: 07/12 Boat ETA: 07/19 Boat | Details 1.7oz Clear Bottle with Foam Pump Head 1.7oz Clear Bottle with Foam Pump Head Total Paid Balance Due For and on behalf of Buyer AUTOTROL CORP 365 East Prairie Street | 50,500 231,020 281,520 | For and of COLORTF | \$0.59 \$0.59 n behalf of Seller REE GROUP, LLC | \$29,795.0 \$136,301.8 \$166,096.8 (\$75,000.0 \$91,096.8 |



| | INVO | ICE | | | |
|---|---|--|------------|----------------------------|---|
| INVOICE TO: | AUTOTROL CORP | | | | |
| ADDRESS: | 365 East Prairie Street | INVOICE #: | CT005 | | |
| | Crystal Lake, IL USA 60039 | DATE ISSUED: | 07/04/202 | .0 | |
| CONTACT: | Robert Frantz | BY: | COLORTI | REE GROUP, LL | .C |
| | Cell: 510-828-6651 | ADDRESS: | 231 West | 39th Street, Suite | e 818 |
| | rob@usabottling.com | | New York | , NY 10018 | |
| | | PHONE: | (212)730- | 1616 | |
| SHIPPING ADDRE | SS: (If difference from above address) | CONTACT: | Frances C | Soldfarb | |
| | | | frances@ | colortreeus.com | |
| | | | | | |
| Unit Cost: | \$0.93/pc | | | | |
| Total Quantity: | 225000pcs | | | | |
| Purchase Terms: | | | *** | | |
| | | | | | |
| | 16oz Clear Bottle with Lotion Pump Head | | | | |
| ITEM: | 1002 Clear Bottle with Lotion Fump nead | | | | |
| DELIVERY: | Sea | | | | |
| DELIVERY: | Sea | Total Piages | | Deigo/DC | Cont |
| DELIVERY: | Sea Details | Total Pieces | | Price/PC | Cost \$125,025,48 |
| Summary ETA: 06/01 Boat | Sea Details 16oz Clear Bottle with Lotion Pump Head | 134,436 | | \$0.93 | \$125,025.48 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Sea Details | DESCRIPTION AND DESCRIPTION OF STREET | | | Cost \$125,025.48 \$66,402.00 \$17,822.52 |
| DELIVERY: | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head | 134,436 71,400 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head | 134,436 71,400 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head | 134,436 71,400 19,164 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: | 134,436 71,400 19,164 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: Paid: | 134,436 71,400 19,164 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 (\$62,512.74 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: Paid: | 134,436 71,400 19,164 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 (\$62,512.74 (\$33,201.00 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat | Sea Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: Paid: Paid: Paid: | 134,436 71,400 19,164 | | \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 (\$62,512.74 (\$33,201.00 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat ETA: 07/04 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: Paid: Paid: Balance Due: | 134,436 71,400 19,164 225,000 | For and on | \$0.93 \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 (\$62,512.74 (\$33,201.00 \$8,911.26 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat ETA: 07/04 Boat | Sea Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: Paid: Paid: Paid: | 134,436 71,400 19,164 225,000 | | \$0.93 \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 (\$62,512.74 (\$33,201.00 \$8,911.26 |
| Summary ETA: 06/01 Boat ETA: 06/08 Boat ETA: 07/04 Boat | Details 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head 16oz Clear Bottle with Lotion Pump Head Total: Paid: Paid: Paid: Balance Due: | 134,436 71,400 19,164 225,000 | COLORTRE | \$0.93 \$0.93 \$0.93 | \$125,025.48 \$66,402.00 \$17,822.52 \$209,250.00 (\$104,625.00 (\$62,512.74 (\$33,201.00 \$8,911.26 |



| | INVO | ICE | | |
|---|--|--|--------------------------------------|--|
| INVOICE TO: | AUTOTROL CORP | | | |
| ADDRESS: | 365 East Prairie Street | INVOICE #: | СТ006 | |
| | Crystal Lake, IL USA 60039 | DATE ISSUED: | 06/01/2020 | |
| CONTACT: | Robert Frantz | BY: | COLORTREE GROUP, L | LC |
| | Cell: 510-828-6651 | ADDRESS: | 231 West 39th Street, Sui | te 818 |
| | rob@usabottling.com | | New York, NY 10018 | |
| | | PHONE: | (212)730-1616 | |
| SHIPPING ADDRE | SS: (If difference from above address) | CONTACT: | Frances Goldfarb | |
| | | | frances@colortreeus.com | |
| | | | | |
| Unit Cost: | \$0.30/pc | | | |
| Total Quantity: | 1100000pcs | | | |
| Purchase Terms: | | | | |
| ITEM: | 1.7oz Clear Bottle with Lotion Pump Head | | | |
| | | | | |
| DELIVERY: | Sea | | | |
| DELIVERY: Summary | Sea Details | Total Pieces | Price/PC | ect |
| Verm | | Total Pieces 250,000 | Price/PC \$0.30 | A STATE OF THE STA |
| Summary | Dotails | The North Control of the Control | | \$75,000.00 |
| Summary ETA: 05/11 Boat | Details 1.7oz Clear Bottle with Lotion Pump Head | 250,000 | \$0.30 | \$75,000.00 \$75,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat | Details 1.7oz Clear Bottle with Lotion Pump Head 1.7oz Clear Bottle with Lotion Pump Head | 250,000 250,000 | \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat | 1.7oz Clear Bottle with Lotion Pump Head 1.7oz Clear Bottle with Lotion Pump Head 1.7oz Clear Bottle with Lotion Pump Head | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat | 1.7oz Clear Bottle with Lotion Pump Head | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 \$330,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat | 1.7oz Clear Bottle with Lotion Pump Head | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 \$330,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat | 1.7oz Clear Bottle with Lotion Pump Head Total: Paid: | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat ETA: 06/01 Boat | 1.7oz Clear Bottle with Lotion Pump Head Total: Paid: | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 \$330,000.00 \$330,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat ETA: 06/01 Boat | Details 1.7oz Clear Bottle with Lotion Pump Head Total: Paid: Balance Due: | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 \$330,000.00 \$330,000.00 |
| Summary ETA: 05/11 Boat ETA: 05/18 Boat ETA: 05/25 Boat ETA: 06/01 Boat | Details 1.7oz Clear Bottle with Lotion Pump Head Total: Paid: Balance Due: | 250,000 250,000 300,000 300,000 | \$0.30 \$0.30 \$0.30 \$0.30 | \$75,000.00 \$75,000.00 \$90,000.00 \$90,000.00 \$330,000.00 \$330,000.00 |

12/2/20 - Wire from Autotrol - \$10,000

FEDWIRE CREDIT VIA: WELLS FARGO BANK/121000248 B/O: KINETIC CERAMICS LLC US REF: CHASE NYC/CTR/BNF=COLORTREE GROUP, LLC NEW YORK NY 10018-0735 US/AC-00 0000002672 RFB=OW00001071548534 OBI =AUTOTROL BOTTLE INVOICE BBI=/CHGS/USD0,00/ IMAD: 120211B7031R001150 TRN: 0645209337FF

ORDERS:

All of the below Orders were from:

BOOK TRANSFER CREDIT B/O: PNC BANK NATIONAL ASSOCIATION AKRON OH 44308- US ORG:/4700998084 AUTOTROL CORP OGB: ABA/043000096 PNC BANK, N.A. REF:/INS/ABA/043000096 PNC BANK TRN: 0564309202EZ

7/20/20 – Wire from Autotrol - \$33,201 (Order 5) 6/16/20 – Wire from Autotrol - \$62,512.74 (Order 5) 5/27/20 – Wire from Autotrol - \$75,000 (Order 1) 5/19/20 – Wire from Autotrol - \$75,000 (Order 1) 5/15/20 – Wire from Autotrol - \$104,625 (Order 5) 5/15/20 – Wire from Autotrol - \$88,500 (Order 3) 5/12/20 – Wire from Autotrol - \$75,000 (Order 4) 5/8/20 – Wire from Autotrol - \$93,000 (Order 2) 5/1/20 – Wire from Autotrol - \$50,000 (Order 1) 4/28/20 – Wire from Autotrol - \$25,000 (Order 1) 4/23/20 – Wire from Autotrol - \$85,000 (Order 1)

Total for Orders 1-5: \$766,838.74